

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL DREW, on behalf of
himself and all others similarly situated,)
)
)
Plaintiff)
)
)
v.) Case No. 20-cv-00402
)
)
AMERICAN DIRECTIONS RESEARCH) Hon. Sharon Johnson Coleman
GROUP, INC.,)
)
)
)
Defendant.)

DEFENDANT'S MOTION TO DISMISS

Defendant American Directions Research Group, Inc. (“American Directions”) respectfully moves to dismiss Plaintiff Michael Drew’s Amended Class Action Complaint for failing to state a claim on which relief can be granted, as set forth more fully in American Direction’s accompanying Memorandum of Law. American Directions requests that the Court dismiss this case with prejudice pursuant to Fed. R. Civ. P. 12(b)(6) and 8(a), and to award all such other relief deemed equitable and just.

Dated: June 12, 2020

Respectfully submitted,

By: /s/ Joseph C. Wylie
Joseph C. Wylie
Molly K. McGinley
Sarah K. Bauman
K&L Gates LLP
70 West Madison Street
Suite 3100
Chicago, Illinois 60602
Tel.: (312) 807-4439
Joseph.Wylie@klgates.com
Molly.McGinley@klgates.com
Sarah.Bauman@klgates.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that on June 12, 2020, the foregoing was filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

Michael Wood
Celetha Chatman
Community Lawyers, Ltd.
20 N. Clark Street, Suite 3100
Chicago, Illinois 60602
Telephone: (312) 757-1880
cchatman@communitylawyersgroup.com
Attorneys for Plaintiffs

/s/ *Joseph C. Wylie*
Joseph C. Wylie